

**United States Environmental Protection Agency
Region VII
POLLUTION REPORT**

Date: Saturday, March 07, 2009

From: Janice Kroone, OSC

Subject: First and Final
Harcros Chemical Response
5200 Speaker Rd, Kansas City, KS
Latitude: 39.0952
Longitude: -94.69843

30020337



Superfund

POLREP No.:	1	Site #:	
Reporting Period:	December 18, 2008	D.O. #:	
Start Date:	12/18/2008	Response Authority:	CERCLA
Mob Date:	12/18/2008	Response Type:	Emergency
Completion Date:	12/18/2008	NPL Status:	Non NPL
CERCLIS ID #:	KSN000706026	Incident Category:	Removal Action
RCRIS ID #:		Contract #	

Site Description

The THCC site is approximately 75 acres bounded on the north by the Kansas River.

Prior to facility operations at the site, general land use in the area was agricultural. A sand plant operated in the area north of the current levee. In about 1958, Thompson Hayward Chemical Company (THCC) acquired the property and began construction of the facility. The facility became operational in December 1960. Facility operations included wholesale distribution of industrial chemicals and supplies and production of phenoxy herbicides, primarily 2,4-dichlorophenoxyacetic acid (2,4-D). In 1961, THCC was sold to Consolidated Electronics Industries, which was owned by The Phillips Trust. The name of the parent company changed after the purchase. In 1963, a process building was constructed to manufacture 2,4,5-trichlorophenoxyacetic acid (2,4,5-T). About 1965, an ethoxylation plant was built and surfactant agents such as industrial emulsifiers, wetting agents, and antifoam agents were manufactured.

About 1967, the facility began to produce 2-(2,4,5-trichlorophenoxy) propionic acid (Silvex). Small amounts of tetrachlorodibenzo-p-dioxins (dioxin) may have been present as a by-product in the processing of the pesticides. Also in 1967, the U.S. government directed THCC to produce Agent Orange II. The facility produced Agent Orange II for about one and one-half (1½) years. Other operations at the facility have included acid packaging, feed supplement binding, and solvent drumming. In 1977, manufacture of phenoxy herbicides at the facility ceased.

In 1981, H&C Acquisitions Inc. purchased certain THCC assets, including the right to the company name and approximately 75 acres of the facility at 5200 Speaker Road. Following the purchase, the old THCC changed its name to Thompson-Hayward Agriculture and Nutrition (THAN), and H&C Acquisitions changed its name to THCC. From late 1982 to mid 1983, THCC operated a pilot solvent recovery operation in the Pilot Plant Complex. On October 5, 1988, THCC changed its name to Harcros Chemicals Inc. (HCI).

A closed surface impoundment is located in the northeast portion of the site. The closed impoundment is a RCRA regulated unit (See Figure 2). The surface impoundment was constructed in 1965 and was designed to contain emergency releases of ethylene oxide. The impoundment was

used until 1973 as an emergency basin and as an evaporation pond to store cooling and rinse waters. Prior to 1973, process waters from the facility were discharged directly into the facility's industrial sewers which discharged directly into the Kansas City, Kansas, municipal sewer system. In 1973, the impoundment was dewatered. A liner and a diffused-air aeration system were installed, and waste from the facility's industrial sewers and a series of trenches and gutters (SWMU C) was discharged directly into the surface impoundment. In November 1988, the surface impoundment was deactivated and the wastewater flows went instead to an aboveground equalization tank prior to discharge to the municipal sewers. The surface water impoundment was closed in-place in 1990.

On December 6, 1978, KDHE notified THCC of a fine for illegal disposal of sludge. At least two other spills or releases had been documented at the facility. KDHE issued Administrative Order No. 85-E-35 on July 15, 1983. Under this order, THCC and THAN were to implement a work plan describing procedures to be followed for gathering data to support the evaluation and design of a remedial program. An amendment to this order was issued on March 26, 1984. Under the amendment, THCC and THAN were directed to restrict access to contaminated areas, plan and implement a schedule for a remedial action, and submit a proposal for further investigation into the nature and extent of groundwater contamination.

Harcros Chemicals and EPA entered into an Administrative Order of Consent (AOC), Docket No. VII-90-H-0028, effective August 3, 1990. HCI was directed by the AOC to complete a RCRA Facility Investigation (RFI) at the 5200 Speaker Road facility. The RFI was to address the SWMU's and other areas of interest. A search of KDHE and EPA records indicates that a Potential Hazardous Waste Site Identification and a Preliminary Assessment Form 2070-22 were completed by EPA on February 10, 1986. A Potential Hazardous Waste Site Inspection Report form 2070-12 was completed by an EPA contractor on February 13, 1984. A Potential Hazardous Waste Site Tentative Disposition form T1070-4 was completed by EPA on September 4, 1989, indicating that KDHE had taken the lead in reviewing and overseeing clean-up of the site.

The file review indicates that response actions addressing releases of hazardous substances, pollutants, or contaminants at the THCC site are being conducted by Harcros Chemicals Inc. under an EPA § 3008 (h) RCRA Administrative Order of Consent, Docket No. VII-90-H-0028. KDHE's Bureau of Waste Management also has oversight authority over the regulated unit (surface impoundment) at the site.

This site therefore qualifies for a no further remedial action planned (NFRAP) classification since the site is being addressed by the responsible party through provisions of RCRA. Further CERCLA response actions consistent with the NCP are not recommended at this site contingent upon continued response by Harcros Chemicals Inc. transferred to BWM.

Current Activities

On December 17, 2008, the Kansas Department of Health and Environment (KDHE) Bureau of Waste Management began a routine hazardous waste inspection at the Harcros Chemical Site in Kansas City, Kansas. During the inspection a room of old laboratory chemicals dating back several decades was discovered. One of the containers, which was labeled as containing phosgene, was extremely corroded.

KDHE requested that Harcros Chemicals immediately arrange for a contractor to prepare the chemical for disposal.

The United States Environmental Protection Agency (EPA) was contacted to follow up with Harcros Chemicals to ensure that appropriate action was taken to package and ship this material to an appropriate disposal facility.

On December 18, 2008, an EPA OSC was dispatched to the site. Upon arrival, the OSC found that the container had been secured in a five-gallon bucket and appropriately labeled for disposal. Phillips Services was contracted by Harcros Chemicals to transport and dispose of this material. This action was conducted while the OSC was on-site. The OSC also conducted a walk through of the chemical storage area and found no other corroded containers during the walk through.

Harcros Chemical had an inventory of materials they deemed ready for disposal and had submitted the inventory to various hazardous waste contractors and disposal facilities. On December 18, 2008, they were awaiting pricing and a schedule for pickup of the materials.

Planned Removal Actions

Harcros Chemical arranged for Phillips Services to remove the repackaged container to Phillips' temporary storage facility. The repackaged container was removed from the Harcros Chemicals' facility on December 18, 2008.

Next Steps

None

Key Issues

None

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
Intramural Costs				
Total Site Costs	\$0.00	\$0.00	\$0.00	0.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

www.epaossc.net/harcrosschemicalresponse